

VERONICA A.F. NEBB

City Attorney, SBN 140001

BY: KATELYN M. KNIGHT

Assistant City Attorney, SBN 264573

CITY OF VALLEJO, City Hall

555 Santa Clara Street, Third Floor

Vallejo, CA 94590

Tel: (707) 648-4545

Email: katelyn.knight@cityofvallejo.net

Attorneys for Defendant CITY OF VALLEJO

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

NEFTALI MONTERROSA, individually
and as co-successor-in-interest to
Decedent SEAN MONTERROSA; NORA
MONTERROSA, individually and as co-
successor-in-interest to Decedent SEAN
MONTERROSA; MICHELLE
MONTERROSA, individually; ASHLEY
MONTERROSA, individually,

Plaintiffs,

v.

CITY OF VALLEJO, a municipal
corporation; JARRETT TONN,
individually, and, Vallejo police officers
DOES 1-25, inclusive,

Defendants.

Case No. 2:20-cv-01563-DAD-SCR

**DEFENDANT CITY OF VALLEJO'S
NOTICE OF REQUEST TO SEAL
DOCUMENTS PURSUANT TO LOCAL
RULE 141**

PLEASE TAKE NOTICE that Pursuant to Eastern District Local Rule 141, Defendant City of Vallejo will and hereby does request that certain documents that Plaintiffs have submitted in opposition to the summary judgment motions filed by Defendants City of Vallejo and Jarrett Tonn be sealed, or in the alternative filed with redactions.

Documents Sought To Be Sealed

Documents produced by the City of Vallejo as Confidential and BATES stamped COV000050-COV000096, which consist of two citizen complaints into peace officer conduct, the resulting investigation reports, and attachments including crime reports, CLETS data, and

1 medical and arrestee records.

2 **Basis for Sealing**

3 Defendant moves to seal the identified BATES numbered documents on the grounds that
4 the City of Vallejo's compelling interests in ensuring the integrity of personnel investigations
5 and effective enforcement and the privacy interests of the subject officers, complainants, and
6 witnesses overwhelmingly outweigh the public's interest in access to these records; particularly
7 in light of the records' limit use and relevance to the instant case.

8 **Manner in which documents were submitted to the Court and served on all parties:**

9 Per Local Rule 141(b), this Notice of Request to Seal Documents will be filed
10 electronically and Defendant will deliver the Request to Seal, Proposed Order and documents at
11 issue via email to the Court and all parties.

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13 DATED: June 26, 2025

Respectfully submitted,

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15 /s/ Katelyn M. Knight
16 KATELYN M. KNIGHT
17 Assistant City Attorney
18 Attorney for Defendant
19 CITY OF VALLEJO
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